

### **REMARKS**

This responds to the Office Action dated on November 16, 2005, and the references cited therewith.

Claims 1 and 11 are amended, claims 15-18 are canceled, and claims 19-23 are added; as a result, claims 1-14 and 19-23 are now pending in this application.

#### **Affirmation of Election**

Restriction to one of the following claims was required:

- I. Claims 1-14, drawn to a device, classified in class 405, subclass 184.3.
- II. Claims 15-18, drawn to a method, classified in class 166, subclass 298.

As provisionally elected by Applicant's representative, David Peterson, on November 8, 2005, Applicant elects to prosecute the invention of Group 1, claims 1-14.

The claims of the non-elected invention, claims 15-18, are hereby canceled. However, Applicant reserves the right to later file continuation or divisional applications having claims directed to the non-elected inventions.

#### **§102 Rejection of the Claims**

Claims 1, 4-6, 8-11, and 13 were rejected under 35 U.S.C. § 102(a) and (e) as being anticipated by Carter et al. (U.S. Publication No. 2002/0067954). Applicant respectfully traverses the rejection for at least the following reasons.

The rejection states that Carter discloses a number of pipe engaging elements that are removable from a base unit and interchangeable. Carter appears to show scoring wheels 52 and blades 56 that are removably engaged with a mole 40 for replacement due to excessive wear. However, Applicant is unable to find in Carter a number of pipe engaging elements that are removable from the base unit and interchangeable in multiple positions along a length of the base unit. In contrast, claims 1 and 11 as amended include a number of pipe engaging elements that are removable from the base unit and interchangeable in multiple positions along a length of the

base unit. Support for the amendments can be found in Applicant's specification in general, and at least on page 3, lines 15-28.

The rejection further stated regarding claim 6 that Carter discloses at least one wedge and at least one wedge mating portion. Element 1196 was cited in the claim 6 rejection. Carter appears to show a "projecting shoulder 1196" (paragraph 0082), however Applicant is unable to find any wedge function of element 1196. Further, element 1196 does not appear to be associated with a pipe gripping device. It appears to be a part of a cable end fixture 1182.

Because the Carter reference does not show every element of Applicant's independent claims, a 35 USC § 102 rejection is not supported. Reconsideration and withdrawal of the rejection are respectfully requested with respect to Applicant's independent claims 1 and 11. Additionally, reconsideration and withdrawal of the rejection are respectfully requested with respect to the remaining claims that depend therefrom as depending on allowable base claims.

Claims 1-3 and 7 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lincoln (U.S. Patent No. 6,109,832). Applicant respectfully traverses the rejection for at least the following reasons.

The rejection stated that Lincoln discloses a number of pipe engaging elements that are removable from a base unit and interchangeable. Lincoln appears to show a fracturing mandrel 40, an expansion mandrel 60, a carrier ring 80, and a casing 25 connected in series. However, Applicant is unable to find in Lincoln a number of pipe engaging elements that are removable from the base unit and interchangeable in multiple positions along a length of the base unit. The order of elements 40, 60, 80, and 25 does not appear to be interchangeable and is determined by unique attachment diameters and rigid tongues 50 and 70.

In contrast, claims 1 and 11 as amended include a number of pipe engaging elements that are removable from the base unit and interchangeable in multiple positions along a length of the base unit. Because Lincoln does not show every element of Applicant's independent claims, a 35 USC § 102 rejection is not supported. Reconsideration and withdrawal of the rejection are respectfully requested with respect to claims 1-3 and 7.

§103 Rejection of the Claims

Claims 12 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Carter et al. (U.S. Publication No. 2002/0067954) in view of Lincoln (U.S. Patent No. 6,109,832). Applicant respectfully submits that the combination of Carter and Lincoln fail to cure the 35 USC § 102 rejections for at least the reasons outlined above.

Because the cited references, either alone or in combination, do not show every element of Applicant's independent claims, a 35 USC § 103(a) rejection is not supported by the references. Reconsideration and withdrawal of the rejection are respectfully requested with respect to claims 12 and 14.

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6944 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.


Respectfully submitted,

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Date 2-13-06

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 13 day of February, 2006.

  
Name

  
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